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10 [Additional Counsel listed on signature block.]

11 Counsel for Movant the Twitter Investor Group

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **OAKLAND DIVISION**

16 KHAN M. HASAN, Individually and on  
behalf of all others similarly situated,

17 Plaintiff,

18 vs.

19 TWITTER, INC., JACK DORSEY, and  
20 NED SEGAL,

21 Defendants.

22 No. 4:19-cv-07149-YGR

23 **NOTICE THAT THE MOTION OF THE  
TWITTER INVESTOR GROUP FOR  
CONSOLIDATION OF THE RELATED  
ACTIONS, APPOINTMENT AS LEAD  
PLAINTIFF, AND APPROVAL OF CO-  
LEAD COUNSEL IS UNOPPOSED**

24 [Additional Caption Below]

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Judge: Hon. Yvonne Gonzalez Rogers  
Courtroom: 1-4th Floor  
Date: February 4, 2020  
Time: 2:00 p.m.

1 KHAFFRE BARCLIFT, Individually and on  
2 behalf of all others similarly situated,

No. 4:19-cv-07992-YGR

3 Plaintiff,

4 vs.

5 TWITTER, INC., JACK DORSEY, and  
6 NED SEGAL,

7 Defendants.

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Movant Twitter Investor Group<sup>1</sup> (the “Twitter Investor Group” or “Movant”) respectfully submits this Notice of Non-Opposition to its pending motion for consolidation of the above-captioned related actions, appointment as lead plaintiff, and approval of its selection of Kaplan Fox & Kilsheimer LLP (“Kaplan Fox”) and Levi & Korsinsky, LLP (“Levi & Korsinsky”) as co-lead counsel in the consolidated action (the “Motion”). ECF No. 31.

Pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), any party seeking appointment as lead plaintiff in the above-captioned actions was required to file a related complaint or move this Court on or before December 30, 2019. On December 30, 2019, the Twitter Investor Group timely filed its Motion and papers in support of consolidation, appointment as lead plaintiff, and approval of its selection of co-lead counsel. *See* ECF No. 31. Two other movants, Hakam Altohol (“Altohol”) and the Weston Family Partnership LLLP (“Weston Family Partnership”) also filed motions for appointment as lead plaintiff. *See* ECF Nos. 26 and 28, respectively. Subsequently, Weston Family Partnership withdrew its motion for lead plaintiff on January 8, 2020, stating that it “does not appear to have the largest financial interest in this litigation.” ECF No. 35. Similarly, on January 10, 2020, Altohol withdrew his motion for plaintiff, stating, “Based upon a review of the motions and supporting documentation provided by the other movants seeking appointment as Lead Plaintiff, it appears that Altohol does not possess the ‘largest financial interest in the relief sought by the class,’ as required by the Private Securities Litigation Reform Act of 1995. 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(bb).” ECF No. 36. Therefore, the Twitter Investor Group’s Motion is unopposed.

Based on the facts presented above and the factual, legal, and financial reasons presented in its Motion and supporting papers, the Twitter Investor Group respectfully requests that the Court issue an Order pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), as amended by the PSLRA: (1) consolidating the above-captioned actions pursuant to Rule 42(a);<sup>2</sup> (2) appointing it as lead plaintiff on behalf of a putative class of all persons or entities that

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<sup>1</sup> The Twitter Investor Group collectively refers to: Thomas Do, Michael J. Conroy, and Richard Slepko.

<sup>2</sup> The Twitter Investor Group, Weston Family Partnership, and Altohol each moved the Court to consolidate the related actions. Defendants, as of the date of filing, have not taken a position on the issue of consolidation. As the related cases involve substantially similar issues of law and fact, they should be consolidated for all purposes.

1 transacted in Twitter, Inc. securities between August 6, 2019 and October 23, 2019, inclusive; (3)  
2 approving Movant's selection of Kaplan Fox and Levi & Korsinsky as Co-Lead Counsel; and (4)  
3 granting such other relief as the Court may deem just and proper.

4 Dated: January 13, 2020

Respectfully submitted,

5 **KAPLAN FOX & KILSHEIMER LLP**

6 By: /s/ Laurence D. King  
7 Laurence D. King

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17 Dated: January 13, 2020

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5 *Counsel for Movant the Twitter Investor Group*

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1                   **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)**

2                   I, Laurence D. King, attest that concurrence in the filing of this document has been obtained  
3 from the other signatory. I declare under penalty of perjury under the laws of the United States of  
4 America that the foregoing is true and correct.

5                   Executed this 13th day of January 2020, at Oakland, California.

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7                   By: /s/ Laurence D. King

8                   Laurence D. King

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